

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

UNITED STATES OF AMERICA

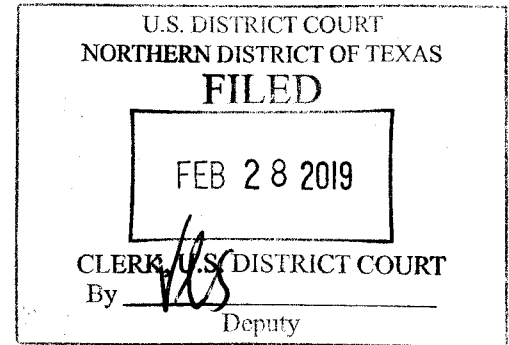
v.

RODNEY JAIME HICKS (01)
ROBERT PERRY BYERS (02)

No. **2-19 CR-043-D**

INDICTMENT

The Grand Jury charges:



Count One

Conspiracy to Produce a False Identification Document
(Violation of 18 U.S.C. § 371)

From on or about a date unknown to the grand jury and continuing until on or about February 13, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Rodney Jaime Hicks** and **Robert Perry Byers**, defendants, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with persons known and unknown to the grand jury to commit an offense against the United States, that is, to knowingly and without lawful authority produce a false identification document, in violation of Title 18, United States Code, Section 1028(a)(1).

Manner and Means

It was part of this conspiracy that one or more of the conspirators would, and did:

1. Obtain names and personal identifiers of individuals and organizations
through thefts and burglaries;

2. Obtain bank account information of individuals and organizations through thefts and burglaries;
3. Possess paraphernalia used to produce false identifications;
4. Make false identifications;
5. Travel to locations inside the Northern District of Texas to use the false identifications to pass counterfeit securities of an organization; and
6. Utter and possess false identifications.

Overt Acts

In furtherance of this conspiracy and to effect the objects thereof, the conspirators committed the following overt acts, among others, in the Northern District of Texas and elsewhere:

Counts Two, Four, and Five of this indictment are hereby incorporated as overt acts of this conspiracy and of this Count One.

All in violation of Title 18, United States Code, Section 371.

Count Two

Production of a False Identification Document
(Violation of 18 U.S.C. §§ 1028(a)(1), 1028(b)(1)(A)(ii), and 1028(c)(3)(A))

From on or about a date unknown to the grand jury and continuing until on or about February 13, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Rodney Jaime Hicks** and **Robert Perry Byers**, defendants, did knowingly and without lawful authority produce a false identification document, to wit: a Texas temporary permit, the production of the false identification document in and affecting interstate commerce, and the offense involved the production and transfer of a false identification document that was and appeared to be a personal identification card.

In violation of Title 18, United States Code, Sections 1028(a)(1), 1028(b)(1)(A)(ii), 1028(c)(3)(A), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Three

Dealing in Counterfeit Obligations or Securities
(Violation of 18 U.S.C. § 473)

From on or about a date unknown to the grand jury and continuing until on or about February 13, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Rodney Jaime Hicks**, defendant, did buy, exchange, transfer and receive falsely made, forged, and counterfeited obligations and other securities of the United States, that is, Federal Reserve Notes, each in five-dollar and ten-dollar denominations, with the intent that said Federal Reserve Notes be passed, published, and used as true and genuine.

In violation of Title 18, United States Code, Section 473.

Count Four

Conspiracy to Utter and Possess Counterfeited Securities of an Organization
(Violation of 18 U.S.C. § 371)

From on or about a date unknown to the grand jury and continuing until on or about February 13, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Rodney Jaime Hicks** and **Robert Perry Byers**, defendants, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with persons known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly utter and possess counterfeited and forged securities of an organization, as that term is defined in Title 18, United States Code, Section 513(c)(4), with the intent to deceive another person and organization, in violation of Title 18, United States Code, Section 513(a).

Manner and Means

It was part of this conspiracy that one or more of the conspirators would, and did:

1. Obtain names and personal identifiers of individuals and organizations through thefts and burglaries;
2. Obtain bank account information of individuals and organizations through thefts and burglaries;
3. Possess paraphernalia used to produce counterfeit securities of an organization;
4. Make counterfeit securities of an organization;

5. Create false identifications for themselves and for other individuals in order to pass the counterfeit checks;
6. Travel to locations inside the Northern District of Texas to utter counterfeit securities of an organization; and
7. Utter and possess counterfeit securities of an organization.

Overt Acts

In furtherance of this conspiracy and to effect the objects thereof, the conspirators committed the following overt acts, among others, in the Northern District of Texas and elsewhere:

Counts One, Two and Five, of this indictment are hereby incorporated as overt acts of this conspiracy and of this Count Four.

All in violation of Title 18, United States Code, Section 371.

Count Five

Uttering and Possessing a Counterfeited Security of an Organization
(Violation of 18 U.S.C. § 513(a))

From on or about a date unknown to the grand jury and continuing until on or about February 13, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Rodney Jaime Hicks** and **Robert Perry Byers**, defendants, did knowingly utter and possess a counterfeited and forged security of an organization, as that term is defined in Title 18, United States Code, Section 513(c)(4), to wit: check number 8702, in the amount of \$687.65, in the name of S.R., and drawn on Bank of America, with the intent to deceive another person and organization.

In violation of Title 18, United States Code, Section 513(a), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Six

Convicted Felon in Possession of Ammunition
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about February 13, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Rodney Jaime Hicks**, defendant, a person who had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce 84 rounds of ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).


Forfeiture Notice
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

Upon conviction of the offense alleged in count six of this indictment, and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), defendant, **Rodney Jaime Hicks**, shall forfeit to the United States of America any ammunition involved in or used in the knowing commission of the offense.

A TRUE BILL:


FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY


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Assistant United States Attorney
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NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

THE UNITED STATES OF AMERICA

v.

RODNEY JAIME HICKS (01)
ROBERT PERRY BYERS (02)

INDICTMENT

- COUNT 1: CONSPIRACY TO PRODUCE A FALSE
IDENTIFICATION DOCUMENT
Title 18, United States Code, Section 371.
- COUNT 2: PRODUCTION OF A FALSE IDENTIFICATION
DOCUMENT
Title 18, United States Code, Sections 1028(a)(1),
(b)(1)(A)(ii), 1028(c)(3)(A).
- COUNT 3: DEALING IN COUNTERFEIT OBLIGATIONS OR
SECURITIES
Title 18, United States Code, Section 473.
- COUNT 4: CONSPIRACY TO UTTER AND POSSESS
COUNTERFEIT SECURITIES OF AN ORGANIZATION
Title 18, United States Code, Section 371.
- COUNT 5: UTTERING AND POSSESSING COUNTERFEIT
SECURITIES OF AN ORGANIZATION
Title 18, United States Code, Section 513(a)
- COUNT 6: CONVICTED FELON IN POSSESSION OF
AMMUNITION
Title 18, United States Code, Section 922(g)(1) and 924(a)(2).

(6 COUNTS and Forfeiture Notice)

A true bill rendered:

Amarillo

Foreperson

Filed in open court this 28th day of February, A.D. 2019.

Clerk

BYERS ON BOND, HICKS IN FEDERAL CUSTODY
(Complaint filed 2/14/19 – 2:19-MJ-40)

Dee Ann Reno
UNITED STATES MAGISTRATE JUDGE